

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

<p>In the Matter of:</p> <p>Inquiry Concerning the Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion and Possible Steps to Accelerate such deployment Pursuant to Section 706 of the Telecommunications Act of 1996</p>	<p style="text-align:center">GN Docket No. 04-54</p>
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COMMENTS OF THE RURAL IOWA INDEPENDENT TELEPHONE ASSOCIATION

By Notice of Inquiry released March 17, 2004, the Commission sought comments into whether advanced telecommunications ability is being deployed to all Americans in a reasonable and timely fashion. The members of the Rural Iowa Independent Telephone Association ("RIITA") are the premier providers of advanced telecommunications services in rural Iowa. Despite the better economies of scale available to large carriers, despite the longer distances and fewer customers per mile facing independent rural carriers, their record of quality service to their customers consistently demonstrates their importance to the national public switched network. RIITA members are rightfully proud of their provision of advanced telecommunications services and provide these comments to the FCC to show the continued success of their companies.

RIITA is a non-profit association of rural independent telephone companies, representing approximately one hundred and thirty Iowa incumbent local exchange carriers.

RIITA's by-laws restrict membership to companies serving fewer than 20,000 access lines. In reality, none of the companies have that many access lines and about one-half of the companies serve fewer than 1000 lines. Most members are exempt rural telephone companies pursuant to section 251(f)(1)(A) of the Telecommunications Act of 1996. 47 U.S.C. § 251(f)(1)(A).

In 2000, RIITA conducted a survey of its membership to determine the number of companies offering broadband access and the methods of provision chosen by the companies. With a 78 percent response rate, twenty percent of the companies were offering broadband access to their customers with over 57 percent planning to deploy within the next three years. Technologies deployed varied, with the majority of the companies offering DSL. About one-third of the companies had invested over \$100,000.00 in broadband technology, a huge sum for companies as small as Iowa companies. The primary factors in deciding to provide broadband access to rural customers were that it was a logical extension of the companies business and to meet customer demand.¹

Only two years later, a survey with a 90 percent response rate demonstrated that over 75 percent of the companies offered broadband by either DSL or wireless offerings, well ahead of the schedule predicted in 2000. This pace accelerated to the point where the Iowa Utilities Board in a 2003 report discussing high-speed internet access in the State of Iowa concluded the "the industry exceeded the near-term deployment schedules" from the Board's prior report. The report also noted that "rural communities are achieving a higher

¹ The Survey results are available on RIITA's website: <http://www.riita.com>.

growth rate in the deployment of high-speed Internet technologies than non-rural communities.”²

The conclusion that rural independent companies have done an excellent job providing advanced telecommunications in Iowa fits with the results across the nation. A whitepaper published by NTCA in July of 2000³ reported that “small rural providers are leading the way in deployment of DSL in rural America.”⁴ The same study reported that while small rural providers are deploying DSL, while at the time RBOCs were only deploying in urban areas.⁵ As NTCA noted even four years ago, rural independents were offering advanced telecommunications at a higher rate because they have historically served their communities well and are closely tied to the communities they serve.⁶

This national trend is strong in Iowa deployment has been strong. In exchanges served by rural independents, customers have access to advanced telecommunications services.

In Iowa, small rural carriers deserve credit for keeping their customers on the cutting edge of advanced telecommunications services.

2 “Assessing High-Speed Internet Access in the State of Iowa: Third Assessment” (May 2003) available at http://www.state.ia.us/government/com/util/Misc/InternetAccess_2003.pdf

3 Lehman, “Who Will Serve Rural America?” Available at http://www.ntca.org/ka/ka-3.cfm?content_item_id=312&folder_id=96

4 Id. at 17

5 Id.

6 Id. at 18.

Respectfully Submitted,

/s/ Thomas G. Fisher Jr.
THOMAS G. FISHER JR.
WHITFIELD & EDDY, P.L.C.
317 Sixth Avenue, Suite 1200
Des Moines, Iowa 50309
(515) 288-6041

ATTORNEYS FOR RURAL IOWA INDEPENDENT
TELEPHONE ASSOCIATION

Copy filed with:

Qualex International, Portals II
445 12th Street S.W.
CY-B402
Washington, D.C. 20554
Served via email to: qualexint@aol.com